## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

LONDON FLEET LIMITED, INC., et al.,

Plaintiffs,

v.

Civil Action No. 04-CV-12325-WGY

LONDON TAXIS NORTH AMERICA, INC. a/k/a LONDON TAXIS OF NORTH AMERICA, INC. et al.,

Defendants.

## JOINT MOTION FOR EXTENSION OF TIME TO RESPOND TO SECOND AMENDED COMPLAINT

Plaintiffs and defendants hereby jointly move this Court to extend the time within which defendants must answer or otherwise respond to the Second Amended Complaint until on or before February 25, 2005. As grounds for this motion, the parties state that:

- Defendants' response to the Second Amended Complaint is currently due on
  February 15, 2005.
- 2. The parties presently are in ongoing settlement negotiations, and therefore are directing their time and energy toward resolution of the overall litigation. It is the parties' hope that this matter can be resolved without the need for further litigation.

## CONCLUSION

The parties respectfully request that this Court grant defendants until February 25, 2005, to answer or otherwise respond to the Second Amended Complaint.

Respectfully submitted,

LONDON FLEET LIMITED, INC., LONDON LONDON TAXIS NORTH AMERICA, INC. FLEET (ILLINOIS), INC., LONDON FLEET (GEORGIA), INC., LONDON FLEET (FLORIDA), INC., LONDON FLEET ADVERTISING AND BILLBOARDS, LLC, METRO TRANSIT MANAGEMENT, INC. and YELLOW INVESTMENTS, INC.,

and LAWRENCE SMITH,

By their attorneys,

By their attorneys,

MICHAEL BEST & FRIEDRICH LLP

**HOLLAND & KNIGHT LLP** 

Michael A. Stiegel, Esq. Helen M. Burke, Esq. Raymond M. Krauze, Esq. 401 N. Michigan Avenue, Suite 1900 Chicago, IL 60611 (312) 222-0800

John P. Driscoll, Jr., Esq. Erik P. Bartenhagen, Esq. NUTTER, McCLENNEN & FISH, LLP World Trade Center West 155 Seaport Boulevard Boston, MA 02210

Dated: February 15, 2005

Joshua C. Krumholz (BBO #552573) Daniel K. Hampton (BBO #634195) 10 St. James Avenue Boston, MA 02116 (617) 523-2700 joshua.krumholz@hklaw.com dan.hampton@hklaw.com

IT IS SO ORDERED

# 2622648\_v1